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October 31, 2001

Colonel Delwyn R. Eulberg
Commander
Headquarters 99th Air Base Wing (ACC)
4430 Grissom Ave Ste 110
Nellis AFB, NV 89191-6520

RE: Requested Information Update on Resumption of Use of Depleted Uranium Rounds at
Nellis Air Force Range Target 63-10

Dear Colonel Eulberg:

On September 15, 1997 the State of Nevada submitted comments¹ on a draft Environmental Assessment (EA) prepared by the United State Air Force for the resumption of use of Depleted Uranium (DU) rounds at Nellis Air Force Range Target 63-10. The Air Force subsequently provided a Final EA and Finding of No Significant Impact for the stated activity. While the Air Force has completed the required National Environmental Policy Act documentation, State officials understand that use of DU has not been activated, pending completion of a DU management plan for Range Target 63-10.

When the Air Force is prepared to resume air-to-ground firing of DU munitions at Target 63-10, State officials would appreciate a briefing in advance of such a decision. There were numerous issues raised in the State's 1997 comments on the referenced EA that we believe require further clarification. Foremost of these surround the status and implementation of the DU management plan referenced in the Final EA. After reviewing a preliminary draft of the plan we understand that it defines several measures for assessing DU contamination at Target 63-10. The plan also includes provisions for annual monitoring, range cleanup, and disposal of both DU residues and contaminated targets.

While State officials recognize the Air Force is self-regulating for cradle to grave management of DU -- per NRC licensed authority, we are nevertheless concerned about potential

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migration of DU in the biosphere. As well, State officials are concerned about final disposition of “rad” contaminated targets that could be moved off the Nellis range and transported through the Las Vegas Valley.

In addition to these concerns, we strongly suggest that before resumption of DU is implemented on the Nellis range, the referenced DU management plan be made available to the public. Please note the referenced EA along with statements contained in the March 1999 Environmental Impact Statement for the renewal of the Nellis range infer that the DU management plan would be implemented prior to expending DU into the environment.

If you have any question about the suggested detailed briefing for certain selected state officials, please contact Mr. Paul Liebendorfer, Nevada Division of Environmental Protection at (775) 687- 4670 ex 3039.

In an effort to keep other state and federal officials abreast of the potential for resumption of use of DU on the Nellis Range, I am requesting the Air Force provide a general overview briefing about DU activities at Target 63-10 at the next Joint Military Affaires Committee (JMAC) meeting.

Sincerely

Heather K. Elliot, Coordinator
State Clearinghouse

Attachment

HE/jbw

cc

Allen Biaggi, NDEP

Robert R. Loux, NWPO

Pam Wilcox, State Lands

John B. Walker, NDEP

Colonel Wilhelm Percival, Nellis

Les Monroe, DOE

¹ See attached letter to Colonel Michael F. Fukey, Nellis Air Force Base from the Nevada State Clearinghouse